

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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THEODUS JORDAN )  
Plaintiff )  
V. ) Civil Action No. 10688-NMG  
BOSTON PUBLIC SCHOOLS )  
Defendant )  
\_\_\_\_\_  
)

**JOINT MOTION TO EXTEND DISCOVERY**

NOW COME the Parties in the above-captioned matter and respectfully move this Court to further extend the period for discovery and all other deadlines in this matter.

In support of this motion, the Parties state that:

1. Plaintiff is in the process of securing legal representation and anticipates that an appearance will be entered by an attorney on his behalf by the end of the month of December;
2. Plaintiff feels he would be prejudiced to conclude the discovery period and subsequent deadlines without the assistance of counsel;
3. Plaintiff has agreed to be deposed December 14, 2006, after the current deadline set for discovery, to avoid excessive and further delays.
4. Defendant has only recently (October 31, 2006) received responses to requests for Interrogatories. Plaintiff has not yet answered requests for documents. In lieu of filing a motion to compel at this time, Defendant has agreed to extend

discovery for the entrance of an attorney to assist Plaintiff in the production of documents.

5. One request for extension of discovery was made by Plaintiff in April 2006, and granted by this Court. Discovery is set to expire November 30, 2006.
6. An extension of the discovery deadline until January 31, 2007 and subsequent deadlines, including summary judgment and trial, if possible would greatly assist the parties in this matter.

WHEREFORE, the parties, respectfully request that this Court extend the discovery period to January 31, 2007 and subsequent deadlines to dates convenient for the Court.

Dated: November 27, 2006

Respectfully submitted,  
Boston School Committee  
By its Attorney,  
Merita Hopkins  
Corporation Counsel

By: /s/ Andrea Alves Thomas  
Andrea Alves Thomas, BBO#660050  
Assistant Corporation Counsel  
Boston Public Schools  
26 Court Street, 7<sup>th</sup> Floor  
Boston, MA 02108  
(617) 635-9320

**CERTIFICATE OF SERVICE**

I, Andrea Alves Thomas, hereby certify that on this 13th day of December, 2005 I have served a copy of the foregoing document via first class mail, postage prepaid, directed to:

Theodus Jordan  
P.O. Box 840  
Jamaica Plain, MA 02130

/s/ Andrea Alves Thomas  
Andrea Alves Thomas

